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UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII
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Michelle Rynne, Clerk of Court

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In Propria Persona

United States District Court District of Hawaii

:Megeso-William-Alan: Denis	
a.k.a: William Denis)
) CASE NO. Civil 21-00011-SOM-RT
)
Plaintiff,) FIRST AMENDED COMPLAINT
V.)
)
DAVID Y. IGE, in his individual)
and official capacity as Governor)
of the State of Hawai'i,)
)
CLARE E. CONNORS, in her)
individual and official capacity)
as Attorney General of the)
State of Hawai'i,)
)
DEREK S.K. KAWAKAMI, in his)
individual and official capacity)
as Mayor of the County of Kaua'i,)
)
TODD RAYBUCK, in his individual	

and official capacity as Chief of)
Police, County of Kaua'i,)
)
DERRICK KELLEY, in his)
individual and official capacity)
as an Officer of Kaua'i Police Dept.,)
)
JOSEPH RUSSELL HIMONGALA,)
in his individual and official capacity)
as an Officer of Kaua'i Police Dept.)
)
Defendants.)

FIRST AMENDED COMPLAINT

Plaintiff alleges the facts and causes of action against the Defendants as set forth in this Complaint.

JURY DEMAND

Plaintiff, who makes a special appearance in proper person, requests a trial by a jury of his peers on all applicable issues under the Rule of Law and the Supreme Law of the Land.

INTRODUCTION

1. Comes now the Plaintiff: Megeso-William-Alan: Denis, a.k.a. William Denis, with the claim that his Birthrights, given to him by his Creator of many names, supersedes any Declarations, Constitutions, Proclamations, Mandates or

edicts by other men, women, corporations, governments, and law enforcement agencies of any kind.

- 2. This case is a Federal Civil Rights action, brought pursuant to Title 42

 U.S. Code Section 1983, to bring forth justice for the deprivation of rights

 committed under the Color of Law including unlawful arrest, incarceration, and

 detainment, and unlawful physical, emotional, intellectual and spiritual harm to the

 Plaintiff effectuated by the Governor's Emergency Proclamation related to

 Covid-19. The actions by the Defendants, by and through edicts, proclamations,

 and mandates masquerading as law, have violated Plaintiff's unalienable

 God-given rights as stated in the 1776 Declaration of Independence, and his

 Constitutional Rights protected in the First and Fourteenth Amendments of the

 Constitutional Republic, as alleged further below.
- 3. Plaintiff is a sovereign sentient being living in the private. Plaintiff resides in the of the state of Hawai'i and is a natural born citizen of the Constitutional Republic, governed by the Supreme Law of the Land known as the 1789 Constitution of the Republic that honors the individual sovereignty of its people and protects and defends the original 1776 Declaration of Independence as legislated by Congress.
- 4. The acts committed by all the named Defendants, under the color of law, imposed by the Governor's proclamation, mandates, edicts and executive orders, as

alleged more fully below, violate Plaintiff's Birthrights and fundamental Constitutional Rights to freedom of speech, the right to peaceable assembly, freedom of movement, freedom of choice, freedom of life, freedom of liberty, freedom to pursue happiness, and the right to due process and the free exercise of religion. The actions by Defendants are criminal in nature and are in direct violation of their oaths of office. Plaintiff has reason to believe and so does believe that the Defendants have committed criminal offences to be listed below.

- 5. The actions of the Defendants resulting from the Governor's proclamations, mandates, edicts, and executive orders, alleged more fully below, are contrary to the Rule of Law and are unconstitutional under the Constitution of the Republic.
- 6. As the violations of the Plaintiff's Birthrights and Constitutional Rights are current, ongoing, and prospective in the near term, injunctive and declaratory relief against the proclamations and executive orders are warranted.

JURISDICTION AND VENUE

7. This court has jurisdiction over the federal claims by operations 28 U.S.C. Sections 1331 and 1343. This court has authority to grant the requested injunctive relief under 28 U.S.C. section 1343 and the requested declaratory relief under 28 sections 2201 and 2202.

THE PARTIES

- 8. :Megeso-William-Alan: Denis, a.k.a. William Denis, hereinafter referred to as Plaintiff, is a minister of Creator's message and a sovereign sentient being living in the private. An honorably discharged soldier, a peaceful religious/spiritual missionary minister, a naturalized citizen of the Constitutional Republic of the united states. Plaintiff is secure in his natural birth rights under the Laws of Nature and of Nature's God. Plaintiff is also secured with his unalienable God-given rights endowed upon him by his Creator, of many names, protected by the original 1776 Declaration of Independence, and the 1789 Constitution of the Republic of the unincorporated united states. Plaintiff honors his religious covenant and oath to protect his Birthrights and his religious connection to his Creator. Plaintiff honors his military oath to protect and defend the Constitution and the Constitutional Republic against all enemies both foreign and domestic.
- 9. Defendant David Y. Ige is the Governor of the State of Hawai'i, and is sued in his individual and official capacity. He is the chief executive of the State of Hawai'i and in that capacity issued the proclamations and supplements and executive orders. Defendant Ige is responsible for executing and administering laws, customs, practices, and policies of the State of Hawai'i, and is currently enforcing the laws, customs, practices, and policies complained of in this action that have violated Plaintiff's rights protected under the First and Fourteenth Amendments. Defendant Ige swore an oath, under God, to follow the Rule of Law,

as well as to serve and protect the Supreme Law of the Land of the Constitutional Republic of the united states and all the people in his state.

- 10. Defendant Clare E. Connors is the Attorney General for the State of Hawai'i and is sued in her individual and official capacity. She formally approved the proclamations and supplements, and is responsible under the law for enforcing its provisions against entities in violation thereof, including the Plaintiff.

 Defendant Connors is responsible for executing and administering laws, customs, practices, and policies of the State of Hawai'i, and is currently enforcing the laws, customs, practices, and policies complained of in this action that have violated Plaintiff's rights protected under the First and Fourteenth Amendments. Defendant Connors swore an oath, under God, to follow the Rule of Law, as well as to serve and protect the Supreme Law of the Land of the Constitutional Republic of the united states and all the people in her state.
- 11. Defendant Derek S.K. Kawakami is the Mayor of the County of Kaua'i, the county in which the Plaintiff resides, and is sued in his individual and official capacity. He is the chief executive of the County of Kaua'i and in that capacity issued the proclamations and supplements and executive orders for this county. Defendant Kawakami is responsible for executing and administering laws, customs, practices, and policies of the County of Kaua'i, and is currently enforcing the laws, customs, practices, and policies complained of in this action

that have violated Plaintiff's rights protected under the First and Fourteenth Amendments. Defendant Kawakami swore an oath, under God, to follow the Rule of Law, as well as to serve and protect the Supreme Law of the Land of the Constitutional Republic of the united states and all the people in the County of Kaua'i.

13. Defendant Todd Raybuck is the Chief of Police of the County of Kaua'i and is responsible for overseeing the operations of the Kaua'i police department in the county in which Plaintiff resides. Defendant Raybuck is responsible for the actions of all police officers within the county police force, including those actions which unduly violated Plaintiffs First and Fourteenth Amendment rights on December 5, 2020, as a result of the Executive Orders issued by Defendants Governor David Y. Ige and Attorney General Clare E. Connors. Defendant Todd Raybuck is responsible for injury to the Plaintiff by failing to act to protect the rights of the Plaintiff when notified by written affidavit of his liability in executing actions against the Plaintiff that violate his God-given rights, including enforcing unlawful mandates promulgated by Defendant Ige. Defendant Raybuck swore an oath, under God, to follow the Rule of Law, as well as to serve and protect the Supreme Law of the Land of the Constitutional Republic of the united states and all the people in the County of Kaua'i.

- 14. Defendant Derrick Kelley is an officer of the Kaua'i Police Department who, acting in direct violation to his oath of office, violated Plaintiff's unalienable God-given Rights protected by the lawful 1776 Declaration of Independence, his First Amendment Constitutional Rights to peaceably assemble and freely express himself and the Fourteenth Amendment right to freedom of movement and substantive due process. Defendant Kelley violated the Plaintiff's Rights by unlawful detainment, unlawful arrest, unlawful incarceration, and bodily harm when Defendant Kelley arrested the Plaintiff based on the premise that he was failing to abide by the Governor's Rules related to Covid-19. Defendant Kelley swore an oath, under God, to follow the Rule of Law, as well as to serve and protect the Supreme Law of the Land of the Constitutional Republic of the united states and all the people in the County of Kaua'i.
- 15. Defendant Joseph Russell Himongala is an officer of the Kaua'i Police Department who, acting in direct violation to his oath of office, violated Plaintiff's unalienable God-given Rights protected by the lawful 1776 Declaration of Independence, his First Amendment Constitutional Rights to peaceably assemble and freely express himself and the Fourteenth Amendment right to freedom of movement and substantive due process. Defendant Himongala violated the Plaintiff's Rights by unlawful detainment, unlawful arrest, unlawful incarceration, and bodily harm when Defendant Himongala arrested the Plaintiff based on the

premise that he was failing to abide by the Governor's Rules related to Covid-19.

Defendant Himongala swore an oath, under God, to follow the Rule of Law, as well as to serve and protect the Supreme Law of the Land of the Constitutional Republic of the united states and all the people in the County of Kaua'i.

CAUSE OF ACTION

16. On December 5, 2020, at approximately 1300 hours Plaintiff was engaged in a peaceful protest on a public sidewalk, in front of the Safeway plaza, in the town of Kapa'a, when Officers with the Kauai Police Department (KPD) converged on the scene and began harassing Plaintiff and two other protestors in the area for "not wearing a face mask." Video evidence obtained by the two protestors clearly show Plaintiff silently holding a free speech sign while properly 'socially distanced' of at least 18 yards which far exceeds the six-foot requested distance suggested in the Governor's and Mayor's proclamations, and would therefore, make Plaintiff exempt from wearing a mask. However, the Defendants Officers Derrick Kelley and Joseph Russell Himongala, proceeded to arrest Plaintiff, depriving him of freedom of movement and his rights to free speech, freedom to assemble and freedom of religion. Plaintiff was committing no crime and was unlawfully arrested, unlawfully detained, unlawfully incarcerated, denied due process, and received bodily harm in the process from both officers of the

Kaua'i County police department. No probable cause was ever alleged, nor was any crime suggested to have been committed.

17. The Kaua'i Police Department operations are overseen by Defendant Chief of Police Todd Raybuck who executes policies and gives orders to Defendants Kelley and Himongala. Defendant Raybuck was notified of liability in failing to uphold his oath to protect the people of Kaua'i, including the Plaintiff, from unlawful, unwarranted mandates, through written affidavit, yet chose to remain silent and failed to act accordingly. Notification of legal responsibility is "the first essential of due process of law." U.S. v. Tweel, 550 F. 2d. 297. "Silence can only be equated with fraud where there is a legal or moral duty to speak or where an inquiry left unanswered would be intentionally misleading."

18. All of the named Defendants have violated Plaintiff's Constitutional rights as outlined in the complaint and are in direct violation of their oaths of office to defend and protect the Constitution as their primary fiduciary responsibility to the people of the nation, their state, and county. Defendants Ige, Connors and Kawakami continue to violate defendant's God-given birth right to freedom of movement, bodily autonomy, free speech and expression and the free exercise of religion by maintaining an assault on the Constitutions of this state and this country through unending mandates that carry the threat of criminal prosecution for failure to adhere. Plaintiff is therefore forced to adopt the practices of a government

mandated religion that involves covering one's face in order to freely move about, violating Plaintiff's own religious convictions that involve communion with Creator through breath and association with his community through facial expression and touch.

STATEMENT OF FACTS

- 19. On March 5, 2020, Defendant Governor Ige declared a state of emergency in Hawai'i alleging an imminent threat of substantial injury or harm to the people of Hawai'i thereby enacting HRS Chapter 127A. A proclamation was issued in which countless rules and regulations that clearly violate the Constitutional rights of the people of Hawai'i were adopted. These rules and regulations have continued to deprive the Plaintiff and the people of Hawai'i of their fundamental rights for over a year with the ability for the Governor to extend the emergency period indefinitely by way of "supplemental" proclamation and in the absence of any legislative process as though we now live in a dictatorship.
- 20. Not once since the initial state of emergency was declared has there been any statistical, substantive, nor scientific proof that a state-wide medical emergency exists yet the deprivation of rights continues without question, leading police officers to violate their oaths of office by enforcing unwarranted and unlawful orders.

- 21. On December 5, 2020, many criminal acts, by the Defendants, were committed that led to the unlawful arrest, unlawful detainment, unlawful incarceration, and bodily harm brought upon the Plaintiff violating his civil rights. The lack of wearing a mask was the action that initiated the unlawful arrest and violation of rights, by the Defendants, while the Plaintiff was defending and protecting his natural Birthrights and covenant with his Creator of many names. Thus, the sign held by the Plaintiff indicated he would not be muzzled. The Plaintiff's religious belief systems, sound intellectual judgment, emotional security, and physical well-being believes, and has evidence that the wearing of a mask is not only unhealthy but a sign of slavery to another man or government, but slavery was abolished in 1865.
- 22. Plaintiff's Covenant, or primary contract, is with the highest authority known as Source energy, Creator, God, Ke Akua, and many other names. Common sense indicates when one is protesting, or boycotting something, they do not participate by wearing or using the product they are speaking out against. It is simply called Freedom of Speech protected by the Free Exercise Clause of the First Amendment of the Constitution of the Republic. The Plaintiff's message was primarily about protecting his Creator as he can only serve one Master. The draconian practices put forth by the unlawful Proclamation by the Governor, and carried out by the Defendants, are in complete violation of the Plaintiff's civil

rights, birthrights, values, morals, and principles sworn to in the covenant with his Creator who endowed him with unalienable birthrights.

- 23. The Laws of Nature are simple. When Plaintiff exited his mother's womb he was not wearing a mask. From that point forward, the Plaintiff is in a state of sovereignty, as his Creator is sovereign, with the protection of freedom of choice to wear or not wear a mask moving forward in life. Plaintiff's religious beliefs are not of a "Religion", as they are not adopted from any doctrine but rather are founded on the personal connection with one's Creator and this relationship is different from all other sentient beings. No two people have the same connection to Source energy, or their Creator, simply defined by our unique DNA. Common sense cannot dispute that fact. Religious Freedom does not imply a specific religion but the practice of one's faith, and covenant with his Creator. Religion by itself is a separator.
- 24. The Plaintiff is not beholden to nor does he give any verbal or written consent or authorization to any corporation, or government that is spreading false misinformation to incite fear, making false claims of a pandemic, forcing people to follow cult like practices against their will, withholding known cures for respiratory illness from the people they swore an oath to protect as the Defendants continue to do. The proclamations set forth by the Governor, and endorsed by all of the Defendants, have no built-in policies for protecting Plaintiff's Birthrights,

Constitutional Rights and Religious Freedoms afforded to him by the Constitutional Republic and Supreme Law of the Land.

25. To frame a narrative like forced mask wearing, mandatory lockdowns, quarantines, and other draconian measures, when known effective cures¹ for the alleged "public health emergency" exist, is serving a deity known as the Baphomet, Lucifer, Baal, or Satan. Plaintiff has no contract, nor gives consent, to any of those occult demonic practices and has clearly stated so in affidavits of truth delivered to the Defendants months in advance without dissent on their part. There is no factual evidence of a pandemic, or even a virus for that matter, and Plaintiff is prepared to prove that before a jury in a lawful court that honors the Supreme Law of the Land, which is always in effect, in our Constitutional Republic founded under God.

26. The Defendants are violating their fiduciary responsibilities and oaths of office to protect all the people and the Constitution of the Republic. The Defendants, by their actions, are violating Plaintiff's intellectual sovereignty, emotional sovereignty, physical sovereignty, and religious or spiritual sovereignty.

https://townhall.com/tipsheet/katiepavlich/2020/04/06/here-are-five-doctors-whose -patients-have-seen-recovery-with-hydroxy-chloroquine-n2566409
http://outbreaknewstoday.com/ivermectin-is-highly-effective-as-a-safe-prophylaxis -and-treatment-for-covid-19-comprehensive-review-12291/https://www.thelancet.com/journals/lanres/article/PIIS2213-2600(21)00211-3/fulltext

The Governor's proclamation is resulting in intellectual abuse, emotional abuse, physical abuse, spiritual abuse, health issues and death by supporting the propaganda of an alleged pandemic from a man-made virus created in Wuhan China by corrupt people who have no value for human life as evidenced over the past 14 months.

LEGAL CONTEXT

27. The Defendants violated Plaintiff's covenant with Creator under the Laws of Nature and of Nature's God as stated in the original 1776 Declaration of Independence, created by the people and the leaders of the 13 original colonies and legislated by the Congress of the thirteen original states protecting the Birthrights of the Plaintiff. Birthrights and Constitutional Rights are also protected by the executive branch of government through the codified and authorized Articles of Confederation, and later the 1789 Constitution of the Republic of the united states. The Supreme Law of the Land that the Defendants swore an oath, under God, is to protect the Constitutional Rights of all the people. The Plaintiff by his notices of Liability Trespass delivered in person, or by tracked Registered mail, to the Defendants and/or their superiors in August, September, and October of 2020 were received without any rebuttal, as the video evidence will prove in court. Plaintiff felt secure that his truth was being honored by the Implied Consent of the

Defendants who simply walked away from the Plaintiff, or otherwise failed to respond.

28. The interpretation that no law can exist and be rightfully upheld when it is in direct opposition to the principles set forth in the United States Constitution reads as follows in Section 177 of the Second Edition of the Sixteenth American Jurisprudence:

"The general misconception is that any statute passed by legislators bearing the appearance of law constitutes the law of the land. The U.S. Constitution is the supreme law of the land, and any statute, to be valid, must be in agreement.

It is impossible for both the Constitution and a law violating it to be valid; one must prevail. This is succinctly stated as follows:

"The general rule is that an unconstitutional statute, though having the form and name of law, is in reality no law, but is wholly void, and ineffective for any purpose; since unconstitutionality dates from the time of its enactment, and not merely from the date of the decision so branding it. As unconstitutional law, in legal contemplation, is as inoperative as if it had never passed. Such a statute leaves the question that it purports to settle just as it would be had the statute not been enacted."

"Since an unconstitutional law is void, the general principles follow that it imposes no duties, confers no right, creates no office, bestows no power or authority on anyone, affords no protection, and justifies no acts performed under it..."

"A void act cannot be legally consistent with a valid one. An unconstitutional law cannot operate to supersede any existing valid law. Indeed, insofar as a statute runs counter to the fundamental law of the land, it is superseded thereby. No one is bound to obey an unconstitutional law and no courts are bound to enforce it." Any court, government or government officer who acts in violation of, in opposition or contradiction to the foregoing, by his, or her own actions, commits treason and invokes the

self-executing Sections 3 and 4 of the 14th Amendment and vacates his, or her office. It is the duty of every lawful American Citizen to oppose all enemies of this Nation, foreign and domestic."

- 29. The First Amendment of the Constitution protects the right to freedom of religion and freedom of expression from government interference. It prohibits any laws that establish a national religion, impede the free exercise of religion, abridge the freedom of speech, infringe upon the freedom of the press, interfere with the right to peaceably assemble, or prohibit citizens from petitioning the government for a redress of grievances. The Supreme Court of the Republic of the united states interprets the extent of the protection afforded to these rights. The First Amendment has been interpreted by the Court as applying to the entire federal government even though it is only expressly applicable to Congress.
- 30. The Fourteenth (14th) Amendment of the Constitution reads: "No State shall deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws." The Court has interpreted the Due Process Clause of the Fourteenth Amendment as protecting the rights in the First Amendment from interference by state governments. The actions of the Defendants have resulted in deprivation of Plaintiff's rights without due process of law, thereby violating the Fourteenth Amendment.

- 31. The 'Mission Statement' of the United States of America was established in the Declaration of Independence of 1776. Therein, it declared that all men have certain Rights that are inherent and unalienable, derived from and endowed upon them by their Creator that includes, at the very least, the Right to Life, to Liberty, and the Freedom to pursue happiness as seen fit by the individual sovereign under the Laws of Nature and of Nature's God as codified and authorized by members of the thirteen original colonies that still holds true today.
- 32. The Judiciary, clerks and officers of the Court, and officers of the Police Force were established to create a sacred trust and fiduciary duty to protect and serve "We The People." There is no legal standard of care higher than a fiduciary duty. This high duty exists so that those persons with such fiduciary duty are expected to use their knowledge and professional expertise to protect, and advance the interests of, free men and citizens, to whom they are responsible. Any breach of this fiduciary duty is a serious matter and can result in litigation, leading to consequences including, but not limited to, material compensatory damages (to the offended party), as well as punitive damages and/or professional consequences to the offending parties.
- 33. Hawai'i State Constitution, Article 1, Section 1.2 states "All persons are free by nature and are equal in their inherent and unalienable rights. Among these rights are the enjoyment of life, liberty and the pursuit of happiness, and the

acquiring and possessing of property. These rights cannot endure unless the people recognize their corresponding obligations and responsibilities." [Am Const Con 1978 and election Nov 7, 1978]

- 34. Hawai'i State Constitution, Article 1, Section 1.4 covers freedom of religion, speech, press, assembly, and petition and so states "No law shall be enacted respecting an establishment of religion, or prohibiting the free exercise thereof, or abridging the freedom of speech or of the press or the right of the people peaceably to assemble and to petition the government for a redress of grievances." [Ren and am Const Con 1978 and election Nov 7, 1978]
- 35. Hawai'i State Constitution, Article 1, Section 1.5 cover due process and equal protection and so states "No person shall be deprived of life, liberty, or property without due process of law, nor be denied the equal protection of the laws, nor be denied the enjoyment of the person's civil rights or be discriminated against in the exercise thereof because of race, religion, sex ,or ancestry." [Ren and am Const Con 1978 and election Nov 7, 1978]
- 36. Hawai'i State Constitution, Article 1, Section 1.8 covers the rights of citizens and states "No citizen shall be disfranchised or deprived of any of the rights or privileges secured to other citizens, unless by the law of the land." [Ren Const Con 1978 and election Nov 7, 1978]

- 37. The defendants have engaged in a myriad of actions that express incompetence, negligence, dereliction of duty, malfeasance, sedition, insurrection, treason and criminal, unconstitutional behavior rendering them unfit to hold public office. The following is a list of criminal codes violated:
 - A. Title 18 §241- Conspiracy against rights.
 - B. Title 18 § 242 Deprivation of rights under the color of law.
 - C. Title 18 § 245 paragraph B federally protected activities, and more.
 - (2) Nothing in this subsection shall be construed to limit the authority of Federal officers, or a Federal grand jury, to investigate possible violations of this section.
 - D. Title 18 §247 Damage to religious property; obstruction of persons in the free exercise of religious beliefs.
 - E. Title 18 §249. Hate crimes.
 - F. Title 18 §1001 Fraud and False Statements > Section 1001 Fictional Communication.
 - G. Title 18 §1038 False information and hoaxes.
 - H. Title 18 §1040 Fraud in connection with a major disaster.
 - I. Title 18 §35 Imparting or conveying false information.
 - J. Title 42 §1985-3 Depriving persons of rights or privileges.

- K. Title 42 §1986 Having knowledge of the wrong & being a party to the crime Action for neglect to prevent.
- 38. Defendants knowingly and willingly kept treatments such as hydroxychloroquine, which is a known therapeutic cure for Covid-19, from the people of Hawai'i. No vaccination, masks, lockdowns, or quarantines are needed nor has it ever been, according to medical experts that will testify to the facts. If covid was a real virus then the defendants have failed in their fiduciary responsibility by not putting biohazard bins around the island so used masks would not contaminate the public. The virus is really a bacterium as no factual viral isolate exists and this can be proven in court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court grant the following relief:

- 39. A combined restitution of Six-Hundred and Thirty-Two Million dollars, from the defendants in their individual and official capacity, for damages, bodily harm, and violation of the Plaintiff's unalienable God-given and Constitutional rights;
- 40. Payment of all hospital bills and doctor's visits associated with the injuries obtained during the unlawful arrest of the Plaintiff;
 - 41. That this Court award Plaintiff legal costs in this action, including travel

expenses, hotel arrangements, mailings, document copies and time spent on this action.

- 42. Plaintiff requests a public apology from each of the defendants on an individual basis, and in their official capacity;
- 43. An injunction be granted prohibiting all Defendants including all of its political entities, agents, and employees, from enforcing any provision of the current Emergency Proclamations, Supplemental Proclamations and Executive Orders in anyway, whether by criminal, civil, or administrative procedures;
- 44. A permanent injunction be granted against the Defendants including but not limited to the State of Hawai'i, and its officers, agents, and employees, prohibiting any arrests, prosecutions, and convictions of any person for alleged violations of the current Emergency Proclamations, Supplemental Proclamations and Executive Orders; and
- 45. A declaratory judgment stating that any and all Emergency Proclamations and Supplemental Proclamations and Executive Orders, are unconstitutional and therefore invalid, null, and void.
- 46. Plaintiff requests monetary relief from each of the Defendants in their individual capacity as follows:
 - 47. Defendant David Y. Ige \$100 million dollars in lawful money.
 - 48. Defendant Clare E. Connors \$100 million dollars in lawful money.

- 49. Defendant Derek S.K. Kawakami \$100 million dollars in lawful money.
- 50. Defendant Todd Raybuck \$57 million dollars in lawful money.
- 51. Defendant Derrick Kelley \$150 million dollars in United States lawful money.
- 52. Defendant Joseph Russell Himongala \$125 million dollars in lawful money.

CONCLUSION

- 53. The Defendants being sued in this complaint committed Domestic and Internationally recognized crimes and unlawful acts against Plaintiff violating his sovereign, inherent, Birthrights, Religious Rights, unalienable God-given Rights and their oaths of office to protect and defend the Constitution of the Republic of the united states, the Constitutional Rights of the governed, and the Plaintiff's Religious Freedoms. These Rights are innate, inviolate, and endowed by our Creator of many names.
- 54. Governments are established for the purpose of securing these Rights among Men. The highest obligation of government is to protect the Rights of the governed. When such governments directly, or indirectly through their representatives, allow the destruction of such Rights it violates its most basic tenants and its principal reason for being. The role of the law enforcement,

military, governmental bodies, and the Judiciary were created to uphold those

Rights and protect the citizenry from betrayal.

55. While courts have allowed broad powers to Governments in which the

violation of fundamental rights is overlooked in order to effectively deal with

emergency situations, ten months has given us ample time to determine that no

such emergency exists, and can be proven based on the current data available

concerning Covid-19. The Court is moved to take a standard review of the situation

and apply strict scrutiny when determining whether the government may continue

to violate Plaintiff's fundamental rights.

VERIFICATION

I, :Megeso-William-Alan: Denis, a.k.a. William Denis, am the Plaintiff in

the above-entitled action. I have read the foregoing and know the contents thereof.

The same is true of my own knowledge, except as to those matters which are

therein alleged on information and belief, and as to those matters, I believe it to be

true. I declare under penalty of perjury that the foregoing is true and correct and

that this declaration was executed at Kapa'a, Hawai'i.

DATED: 06/04/2021

William Denis /s/: Megeso-William-Alan: Denis

William Denis

:Megeso-William-Alan: Denis

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